



*Peñuelas Valley Landfill, LLC.
PO Box 918
Punta Santiago, PR 00741-0918*

June 15, 2018

Team Leader
Clean Water Act Team
Multimedia Permits and Compliance Branch
Caribbean Environmental Protection Division
US Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
Guaynabo, PR 00968-8069

Director, Water Quality Area
Environmental Quality Board
PO Box 11488
San Juan, PR 00910

**Re: Administrative Compliance Order
Peñuelas Valley Landfill, LLC./EC Waste, LLC.
Docket Number CWA-02-2017-3103
NPDES Tracking Number PRR053203
Progress Report**

Dear Team Leader:

The referenced order requires submittal of a progress report of corrective actions to be completed to reduce the total suspended solids (TSS) in the discharge. Peñuelas Valley Landfill (PVL) has continued to take measures to lower the TSS in the discharge. This report covers the month May 2018. During the period there were sporadic rain events that did not generate a discharge that could be sampled. During the period the site registered 2.11 inches of precipitation. The sedimentation pond is designed to hold approximately five feet of water before there is a discharge. The current water level in the pond is more than 4 feet below the overflow level.

The site continues to provide maintenance to erosion and sedimentation control devices as necessary. Silt fences are being kept in place and new ones installed were needed. Additional energy dissipaters have been installed on the storm water down chute near the soil extraction area (see enclosed photo). In addition, the site also continues to perform road spraying for the control of fugitive dust and periodic road washing is being performed to prevent mud accumulation and potential discharge during heavy rain events.

PVL continues to evaluate methods for the control of TSS in the storm water discharge. As part of the efforts to identify solutions for the control of TSS PVL collected a grab sample from the water that is accumulated in the sedimentation pond. The sample was collected on May 29, 2018. There were no significant rain events during the 10 days before the sampling event. The TSS result for the pond sample was 248 mg/l which is similar to the 240 mg/l result for the sample collected from the discharge on March 23, 2018. The site continues to evaluate the situation in order to resolve this matter and bring it to a conclusion.

The statement below follows the requirements of the request for information. The questions and requested presented in the request for information are answered in the attached document.

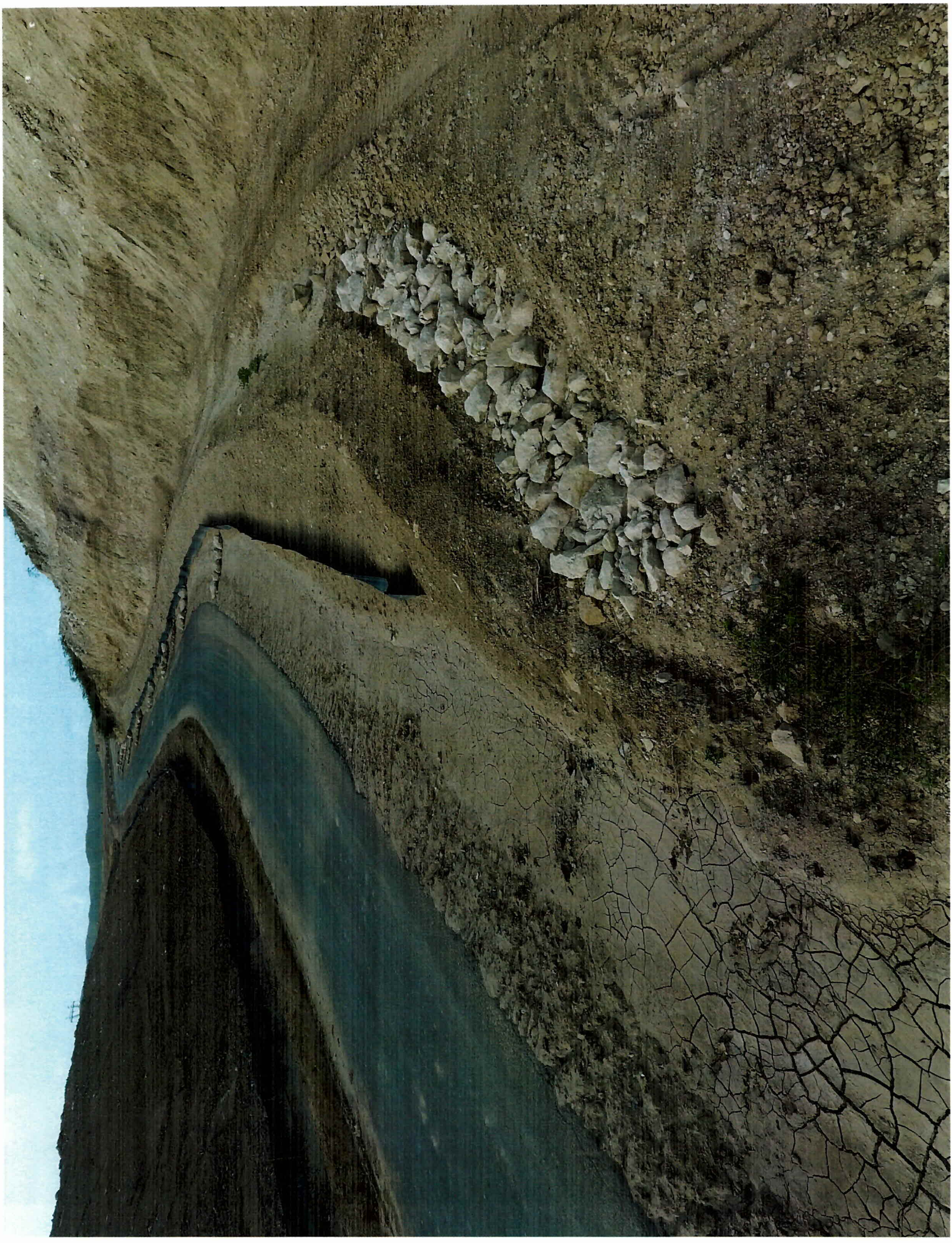
"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Should you require additional information please contact Jaime Jaén on 787-391-0074 or René Rodríguez on 787-447-2717.

Cordially,



René R. Rodríguez
Director of EH&S Compliance



REPORT OF ANALYSIS

Certificate Number: CERT - 24541

June 7, 2018

Customer Name:	EC WASTE	Custody Number:	93599
Contact:	MARIA VIDAL	Sampled Date:	Tuesday, May 29, 2018
Customer Address:	P O BOX 918	Sampled Time:	0940 hrs.
	PUNTA SANTIAGO PR 00741-0918	Received Date:	Wednesday, May 30, 2018
Phone/Fax:	787-836-3700	Sample Received Time:	1505 hrs.
Contact Email:	mvidal@ecwaste.com	Sample Matrix:	Liquid
Sampled By:	Maria Vidal	Sample Type:	Grab
Sample Received By:	S. Aponte	Temp Received at Lab:	2 °C
Sample Delivered By:	D. Cales	Lab. Sample Number:	AT-18-3238
Project and Sample Description:	Water Test Charca de Sedimentación		

Parameter	Units	Result	Discharge Limit	Method	Method Detection Limit	Analysis Date	Analysis Time	Analyst
Total Suspended Solids	mg/L	248	250	SM 2540D	4.0	May 31, 2018	1015	JB

Saira Vázquez Báez

Saira Vázquez Báez

Laboratory Operations Director

Licensed Chemist #5471



CSDH 15524

CUSTODY #

Customer Company Name & Address: EC waste				Customer Contact (Print name & sign): *Maria Vidal <i>Maria Vidal</i>																																																																																																																																																			
Project Name: Chemical Test				Project Address: Peñuelas																																																																																																																																																			
TURN AROUND TIME: Rush <input type="checkbox"/> Days <input checked="" type="checkbox"/> Normal <input type="checkbox"/> Invoice to sample <input type="checkbox"/> Owner <input type="checkbox"/> Consultant <input type="checkbox"/>				Phone:																																																																																																																																																			
ANALYSIS TYPE		SAMPLE TYPE		SAMPLE MATRIX		# CONTAINERS																																																																																																																																																	
<input checked="" type="checkbox"/> Chemical	<input type="checkbox"/> Microbiology	Source Water	Drinking Water	<input checked="" type="checkbox"/> Liquid	Sterile																																																																																																																																																		
ENVIRONMENTAL CONDITION		Waste Water	Food	Solid	Plastic																																																																																																																																																		
<input checked="" type="checkbox"/> Sunny	<input type="checkbox"/> Cloudy	Ground Water	Solid Waste	Oil	Glass																																																																																																																																																		
<input type="checkbox"/> Rainy	<input type="checkbox"/> Windy	Soil	Composite HRS	Sludge	Vials																																																																																																																																																		
<input type="checkbox"/> Fugitive Dust	<input type="checkbox"/> Other	Seawater	<input checked="" type="checkbox"/> Grab	Other	Other																																																																																																																																																		
LAB. SAMPLE # (LAB USE)	DATE	TIME	SAMPLE DESCRIPTION OR SAMPLING POINT NUMBER																																																																																																																																																				
AT-18-323	05-29-18	0940	Charca de Sedimentación																																																																																																																																																				
<table border="1"> <thead> <tr> <th>METALS</th> <th colspan="2">WET CHEMISTRY</th> <th>CHROMATOGRAPHY</th> </tr> </thead> <tbody> <tr><td>Aluminum (A,C)</td><td>Acidity (A)</td><td>Phenol (A)</td><td>BTEX (A,E)</td></tr> <tr><td>Antimony (A,C)</td><td>Alkalinity (A)</td><td>P. Total (A, B)</td><td>BTEX (A)</td></tr> <tr><td>Arsenic (A,C)</td><td>Ammonia (A,B)</td><td>Res. Chlorine (A)</td><td>Chloroform as TTO (A) (E)</td></tr> <tr><td>Barium (A,C)</td><td>Asbestos (A)</td><td>Set. Solids mg/L (A)</td><td>Dioxin (A)</td></tr> <tr><td>Berilium (A,C)</td><td>Bicarbonate (A)</td><td>Set. Solids mL (A)</td><td>MEK(A)</td></tr> <tr><td>Bismuth (A,C)</td><td>BOD-5 (A)</td><td>Silica (A)</td><td>MTBE(A)</td></tr> <tr><td>Boron (A,C)</td><td>Bromide (A)</td><td>Solids Total (A)</td><td>PCBS(A) 8082 808 (A)</td></tr> <tr><td>Cadmium (A,C)</td><td>CaO MgO (1)</td><td>Sulfate(A)</td><td>Pesticide - TTO (A)</td></tr> <tr><td>Calcium (A,C)</td><td>Carbonate (A)</td><td>Sulfide UND (D,H,A)</td><td>Phenols by GC (A)</td></tr> <tr><td>Chromium (A,C)</td><td>Chloride (A)</td><td>Sulfite (A)</td><td>TBA (A)</td></tr> <tr><td>Chromium VI(A,C)</td><td>COD (A,B)</td><td>Surfactant (A)</td><td>TPH D G O (A)</td></tr> <tr><td>Cobalt (A,C)</td><td>Color ADMI (A)</td><td><input checked="" type="checkbox"/> Suspended Solids (A)</td><td>TTO (A,E)</td></tr> <tr><td>Cooper (A,C)</td><td>Color Pt-Co (A)</td><td>TDS (A)</td><td>TTO Semi-Volatile (A)</td></tr> <tr><td>Gold (A)</td><td>Conductivity (A)</td><td>TKN (A,B)</td><td>VOCs - TTO (A)</td></tr> <tr><td>Hardness (A,C)</td><td>Cyanide (A,D,G)</td><td>TOC (A,B)</td><td>MICROBIOLOGY</td></tr> <tr><td>Iron (A,C)</td><td>D.O (A)</td><td>Turbidity (A)</td><td>Total Coliform (A,F)</td></tr> <tr><td>Lead (A,C)</td><td>Fluoride (A)</td><td></td><td>Fecal Coliform (A,F)</td></tr> <tr><td>Lead (A)</td><td>Iodide (A)</td><td>RCRA</td><td>HPC (A,F)</td></tr> <tr><td>Lithium (A,C)</td><td>Iodine (A)</td><td>Reactivity (A)</td><td>Enterococcus (A,F)</td></tr> <tr><td>Magnesium (A,C)</td><td>MLVSS (A)</td><td>Corrosivity (A)</td><td>E. Coli 0157 MPN (A,F)</td></tr> <tr><td>Manganese (A,C)</td><td>Moisture (A)</td><td>Ignitability (A)</td><td>Mold & Yeast (A,F)</td></tr> <tr><td>Mercury (A,C)</td><td>Nitrate & Nitrite (A)</td><td>Metals - TCLP (A)</td><td>Salmonella (A,F)</td></tr> <tr><td>Molybdenum (A,C)</td><td>Nitrate (A)</td><td>Volatile - TCLP (A)</td><td>Campylobacter(A,F)</td></tr> <tr><td>Nickel (A,C)</td><td>Nitrite (A)</td><td>Semi-Volatile-TCLP (A)</td><td>Listeria (A,F)</td></tr> <tr><td>Potassium (A,C)</td><td>O&G Total (A,B)</td><td>Pesticide - TCLP (A)</td><td>FOOD ANALYSES</td></tr> <tr><td>Selenium (A,C)</td><td>O&G TPH (A,B)</td><td>Herbicide - TCLP (A)</td><td>% Collagen</td></tr> <tr><td>Silicon (A,C)</td><td>Ortho Phosphate (A,B)</td><td>TOX (A)</td><td>% FAT</td></tr> <tr><td>Silver (A,C)</td><td></td><td></td><td>% Protein</td></tr> <tr><td>Sodium (A,C)</td><td>O₂ mg/l</td><td></td><td>Water Activity - Aw</td></tr> <tr><td>Strontium (A,C)</td><td></td><td></td><td>LEGEND PRESERVATION USED</td></tr> <tr><td>Thallium (A,C)</td><td>pH su</td><td>A Ice (Cool, 4 °C)</td><td>E HCL</td></tr> <tr><td>Tin (A,C)</td><td></td><td>B H₂SO₄</td><td>F Sodium Thiosulfate</td></tr> <tr><td>Titanium (A,C)</td><td>Temp °C</td><td>C HNO₃</td><td>G Ascorbic Acid</td></tr> <tr><td>Vanadium (A,C)</td><td></td><td>D Na OH</td><td>H Zinc Acetate</td></tr> <tr><td>Zinc (A,C)</td><td>Cl₂ mg/l</td><td>I Other:</td><td></td></tr> </tbody> </table>								METALS	WET CHEMISTRY		CHROMATOGRAPHY	Aluminum (A,C)	Acidity (A)	Phenol (A)	BTEX (A,E)	Antimony (A,C)	Alkalinity (A)	P. Total (A, B)	BTEX (A)	Arsenic (A,C)	Ammonia (A,B)	Res. Chlorine (A)	Chloroform as TTO (A) (E)	Barium (A,C)	Asbestos (A)	Set. Solids mg/L (A)	Dioxin (A)	Berilium (A,C)	Bicarbonate (A)	Set. Solids mL (A)	MEK(A)	Bismuth (A,C)	BOD-5 (A)	Silica (A)	MTBE(A)	Boron (A,C)	Bromide (A)	Solids Total (A)	PCBS(A) 8082 808 (A)	Cadmium (A,C)	CaO MgO (1)	Sulfate(A)	Pesticide - TTO (A)	Calcium (A,C)	Carbonate (A)	Sulfide UND (D,H,A)	Phenols by GC (A)	Chromium (A,C)	Chloride (A)	Sulfite (A)	TBA (A)	Chromium VI(A,C)	COD (A,B)	Surfactant (A)	TPH D G O (A)	Cobalt (A,C)	Color ADMI (A)	<input checked="" type="checkbox"/> Suspended Solids (A)	TTO (A,E)	Cooper (A,C)	Color Pt-Co (A)	TDS (A)	TTO Semi-Volatile (A)	Gold (A)	Conductivity (A)	TKN (A,B)	VOCs - TTO (A)	Hardness (A,C)	Cyanide (A,D,G)	TOC (A,B)	MICROBIOLOGY	Iron (A,C)	D.O (A)	Turbidity (A)	Total Coliform (A,F)	Lead (A,C)	Fluoride (A)		Fecal Coliform (A,F)	Lead (A)	Iodide (A)	RCRA	HPC (A,F)	Lithium (A,C)	Iodine (A)	Reactivity (A)	Enterococcus (A,F)	Magnesium (A,C)	MLVSS (A)	Corrosivity (A)	E. Coli 0157 MPN (A,F)	Manganese (A,C)	Moisture (A)	Ignitability (A)	Mold & Yeast (A,F)	Mercury (A,C)	Nitrate & Nitrite (A)	Metals - TCLP (A)	Salmonella (A,F)	Molybdenum (A,C)	Nitrate (A)	Volatile - TCLP (A)	Campylobacter(A,F)	Nickel (A,C)	Nitrite (A)	Semi-Volatile-TCLP (A)	Listeria (A,F)	Potassium (A,C)	O&G Total (A,B)	Pesticide - TCLP (A)	FOOD ANALYSES	Selenium (A,C)	O&G TPH (A,B)	Herbicide - TCLP (A)	% Collagen	Silicon (A,C)	Ortho Phosphate (A,B)	TOX (A)	% FAT	Silver (A,C)			% Protein	Sodium (A,C)	O ₂ mg/l		Water Activity - Aw	Strontium (A,C)			LEGEND PRESERVATION USED	Thallium (A,C)	pH su	A Ice (Cool, 4 °C)	E HCL	Tin (A,C)		B H ₂ SO ₄	F Sodium Thiosulfate	Titanium (A,C)	Temp °C	C HNO ₃	G Ascorbic Acid	Vanadium (A,C)		D Na OH	H Zinc Acetate	Zinc (A,C)	Cl ₂ mg/l	I Other:	
METALS	WET CHEMISTRY		CHROMATOGRAPHY																																																																																																																																																				
Aluminum (A,C)	Acidity (A)	Phenol (A)	BTEX (A,E)																																																																																																																																																				
Antimony (A,C)	Alkalinity (A)	P. Total (A, B)	BTEX (A)																																																																																																																																																				
Arsenic (A,C)	Ammonia (A,B)	Res. Chlorine (A)	Chloroform as TTO (A) (E)																																																																																																																																																				
Barium (A,C)	Asbestos (A)	Set. Solids mg/L (A)	Dioxin (A)																																																																																																																																																				
Berilium (A,C)	Bicarbonate (A)	Set. Solids mL (A)	MEK(A)																																																																																																																																																				
Bismuth (A,C)	BOD-5 (A)	Silica (A)	MTBE(A)																																																																																																																																																				
Boron (A,C)	Bromide (A)	Solids Total (A)	PCBS(A) 8082 808 (A)																																																																																																																																																				
Cadmium (A,C)	CaO MgO (1)	Sulfate(A)	Pesticide - TTO (A)																																																																																																																																																				
Calcium (A,C)	Carbonate (A)	Sulfide UND (D,H,A)	Phenols by GC (A)																																																																																																																																																				
Chromium (A,C)	Chloride (A)	Sulfite (A)	TBA (A)																																																																																																																																																				
Chromium VI(A,C)	COD (A,B)	Surfactant (A)	TPH D G O (A)																																																																																																																																																				
Cobalt (A,C)	Color ADMI (A)	<input checked="" type="checkbox"/> Suspended Solids (A)	TTO (A,E)																																																																																																																																																				
Cooper (A,C)	Color Pt-Co (A)	TDS (A)	TTO Semi-Volatile (A)																																																																																																																																																				
Gold (A)	Conductivity (A)	TKN (A,B)	VOCs - TTO (A)																																																																																																																																																				
Hardness (A,C)	Cyanide (A,D,G)	TOC (A,B)	MICROBIOLOGY																																																																																																																																																				
Iron (A,C)	D.O (A)	Turbidity (A)	Total Coliform (A,F)																																																																																																																																																				
Lead (A,C)	Fluoride (A)		Fecal Coliform (A,F)																																																																																																																																																				
Lead (A)	Iodide (A)	RCRA	HPC (A,F)																																																																																																																																																				
Lithium (A,C)	Iodine (A)	Reactivity (A)	Enterococcus (A,F)																																																																																																																																																				
Magnesium (A,C)	MLVSS (A)	Corrosivity (A)	E. Coli 0157 MPN (A,F)																																																																																																																																																				
Manganese (A,C)	Moisture (A)	Ignitability (A)	Mold & Yeast (A,F)																																																																																																																																																				
Mercury (A,C)	Nitrate & Nitrite (A)	Metals - TCLP (A)	Salmonella (A,F)																																																																																																																																																				
Molybdenum (A,C)	Nitrate (A)	Volatile - TCLP (A)	Campylobacter(A,F)																																																																																																																																																				
Nickel (A,C)	Nitrite (A)	Semi-Volatile-TCLP (A)	Listeria (A,F)																																																																																																																																																				
Potassium (A,C)	O&G Total (A,B)	Pesticide - TCLP (A)	FOOD ANALYSES																																																																																																																																																				
Selenium (A,C)	O&G TPH (A,B)	Herbicide - TCLP (A)	% Collagen																																																																																																																																																				
Silicon (A,C)	Ortho Phosphate (A,B)	TOX (A)	% FAT																																																																																																																																																				
Silver (A,C)			% Protein																																																																																																																																																				
Sodium (A,C)	O ₂ mg/l		Water Activity - Aw																																																																																																																																																				
Strontium (A,C)			LEGEND PRESERVATION USED																																																																																																																																																				
Thallium (A,C)	pH su	A Ice (Cool, 4 °C)	E HCL																																																																																																																																																				
Tin (A,C)		B H ₂ SO ₄	F Sodium Thiosulfate																																																																																																																																																				
Titanium (A,C)	Temp °C	C HNO ₃	G Ascorbic Acid																																																																																																																																																				
Vanadium (A,C)		D Na OH	H Zinc Acetate																																																																																																																																																				
Zinc (A,C)	Cl ₂ mg/l	I Other:																																																																																																																																																					
Comments & Special Instructions: Cliente solicitó que fuese solamente TSS.				<table border="1"> <thead> <tr> <th>CONDITIONS OF SAMPLES UPON RECEIPT</th> <th>TEMPERATURE OF SAMPLE</th> <th>CONDITION SAMPLE</th> <th>LABORATORY ACTION</th> </tr> </thead> <tbody> <tr> <td>Thermometer Serial # 8433</td> <td>Room Temperature</td> <td><input checked="" type="checkbox"/> Sample Intact</td> <td><input checked="" type="checkbox"/> Sample Accepted</td> </tr> <tr> <td></td> <td>Frozen</td> <td>Properly Preserved</td> <td>Sample Rejected</td> </tr> <tr> <td></td> <td>RECEIVED AT 2 °C</td> <td>Sample Compromised</td> <td></td> </tr> </tbody> </table>				CONDITIONS OF SAMPLES UPON RECEIPT	TEMPERATURE OF SAMPLE	CONDITION SAMPLE	LABORATORY ACTION	Thermometer Serial # 8433	Room Temperature	<input checked="" type="checkbox"/> Sample Intact	<input checked="" type="checkbox"/> Sample Accepted		Frozen	Properly Preserved	Sample Rejected		RECEIVED AT 2 °C	Sample Compromised																																																																																																																																	
CONDITIONS OF SAMPLES UPON RECEIPT	TEMPERATURE OF SAMPLE	CONDITION SAMPLE	LABORATORY ACTION																																																																																																																																																				
Thermometer Serial # 8433	Room Temperature	<input checked="" type="checkbox"/> Sample Intact	<input checked="" type="checkbox"/> Sample Accepted																																																																																																																																																				
	Frozen	Properly Preserved	Sample Rejected																																																																																																																																																				
	RECEIVED AT 2 °C	Sample Compromised																																																																																																																																																					
Sample Collected & Relinquished by (Print name & sign): *Maria Vidal <i>Maria Vidal</i>		Date: 05-30-18	Received by (Print name & sign): Delwin Cales <i>Delwin Cales</i>		Date: 05-30-18	Delivery to Lab. by (Print name & sign): Delwin Cales <i>Delwin Cales</i>																																																																																																																																																	
Company: EC waste		Time: 0930	Company: ALCHEM LAB		Time: 0930	Collector ID#																																																																																																																																																	
Relinquished by (Print name & sign):		Date:	Received by (Print name & sign):		Date:	Received at Lab. by (Print name & sign):																																																																																																																																																	
Company:		Collector ID#	Company:		Collector ID#	Time: 1505																																																																																																																																																	
Date:		Date:		Date:		Time: 1505																																																																																																																																																	
Time:		Time:		Time:		Time: 1505																																																																																																																																																	
Collector ID#		Collector ID#		Collector ID#		Time: 1505																																																																																																																																																	